

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW MEXICO

In re:

SJE, Inc., a New Mexico Corporation  
d/b/a Roto-Rooter

Case No. 17-11198-ja11  
Chapter 11

Debtor.

**NOTICE OF DEADLINE TO OBJECT TO  
DEBTOR IN POSSESSION'S MOTION TO SCRAP VEHICLES**

On July 7, 2017, the debtor, SJE, Inc., a New Mexico Corporation d/b/a Roto-Rooter (the “**Debtor**”), filed *Debtor in Possession's Motion to Scrap Vehicles* (Docket No. 50) (the “**Motion**”). Copies of the Motion can be inspected between 8:30 a.m. and 4:30 p.m. at the Office of the Clerk, United States Bankruptcy Court, Federal Building and United States Courthouse, 500 Gold Ave. SW, Tenth Floor, Albuquerque, N.M. or can be viewed for a per page fee via the Public Access to Electronic Court Records system (“PACER”). You can log on to PACER at <https://ecf.nmb.uscourts.gov>. For registration and usage instructions, see PACER: <http://pacer.psc.uscourts.gov>.

In part, the Motion states:

1. Commencement of the Case. On May 11, 2017 (the “**Petition Date**”), the Debtor commenced this bankruptcy case by filing a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. Pursuant to Bankruptcy Code §§ 1107(a) and 1108, Debtor has retained possession of its assets as Debtor in Possession.
2. Jurisdiction and Venue. The Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding under 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The Vehicles. On July 7, 2017, the Debtor filed *Amended Schedules A/B, and Statement of Financial Affairs* (Doc. No. 49), which, *inter alia*, disclosed it owned the following vehicles: (i) a 2000 Chevy Cargo Van, VIN# 1GCHG35R7Y115998; and (ii) a 2006 Ford E250 Van, VIN# 1FTNE24L16HB04742 (together, the “**Vehicles**”). The Vehicles are beyond repair and estimated each to have a scrap value of \$100.00. The Debtor is not aware of any liens on any the Vehicles.
4. Proposed Recycling of the Vehicles. By this Motion, the Debtor seeks authority from the Court to scrap and recycle the Vehicles with Mr. G's Recycling in exchange for the aggregate value of the scrapped material totaling \$200.00. The Debtor will not be charged towing costs.
5. The Proposed is fair and equitable, and is in the best interests of and beneficial to the Debtor's estate and the creditors. The Debtor has researched and analyzed the value of the Vehicles and believes recycling the Vehicles is in the best interest of the estate. Given the inoperative condition of the Vehicles, recycling the Vehicles a reasonable cost-effective alternative that will eliminate towing expenses the Debtor would otherwise incur to dispose of the Vehicles.

Any party objecting to the Motion must file its objection with the Clerk of the Court of the United States Bankruptcy Court, Dennis Chavez Federal Building and United States Courthouse, Tenth Floor, 500 Gold Avenue SW, Albuquerque, New Mexico 87102 (or P.O. Box 546, Albuquerque, NM 87103), **within twenty-one (21) days after the date of mailing of this Notice, plus three (3) days for service of this Notice by mail, for a total of twenty-four (24) days**. If you are an attorney, you must electronically file your objection at <https://ecf.nmb.uscourts.gov/cgi-bin/login.pl>. You must provide a copy of your objection to Daniel A. White, Esq., Askew & Mazel, LLC, 1122 Central Ave. SW, Ste. 1, Albuquerque, NM 87102. If an objection is timely filed, a hearing to consider it will be held on notice to the attorney for the Debtor, and any objecting party. If no objections are timely filed, an order granting the request in the Motion will be presented to the Court for entry without a hearing or further notice.

Date of Mailing: July 10, 2017

Number of Notices Mailed: 28

ASKEW & MAZEL, LLC

By: *s/ filed electronically*

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*Attorneys for the Debtor in Possession*

I hereby certify that a copy of the foregoing Notice was sent on July 10, 2017, via United States Mail, postage prepaid, to all creditors and parties in interest, as shown on the Mailing Matrix, attached to the original of this Notice.

*/s/ filed electronically*

Daniel A. White